

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

In re:

RMS TITANIC, INC., *et al.*,<sup>1</sup>

Debtors.

Case No. 3:16-bk-02230-PMG  
Chapter 11 (Jointly Administered)

---

**CERTIFICATION OF NECESSITY OF  
REQUEST FOR EMERGENCY HEARING**

I HEREBY CERTIFY, as a member of the Bar of the Court, that I have carefully examined the matter under consideration and to the best of my knowledge, information and belief formed after reasonable inquiry, all allegations are well grounded in fact and all contentions are warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law can be made, that the matter under consideration is not interposed for any improper purpose, such as to harass, to cause delay, or to increase the cost of litigation, and there is just cause to request a consideration of the following pleading on an emergency basis:

**Debtors' Emergency Amended Motion for Extension of Exclusivity and Request for Emergency Hearing [D.E. 260]**

I CERTIFY FURTHER that the necessity of this emergency hearing has not been caused by a lack of due diligence on my part, but has been brought about only by

---

<sup>1</sup> The Debtors in the chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: RMS Titanic, Inc. (3162); Premier Exhibitions, Inc. (4922); Premier Exhibitions Management, LLC (3101); Arts and Exhibitions International, LLC (3101); Premier Exhibitions International, LLC (5075); Premier Exhibitions NYC, Inc. (9246); Premier Merchandising, LLC (3867); and Dinosaurs Unearthed Corp. (7309). The Debtors' service address is 3045 Kingston Court, Suite I, Peachtree Corners, Georgia 30071.

circumstances beyond my control or that of my client. I further certify that this motion is filed with full understanding of F.R.B.P. 9011 and the consequences of noncompliance with same.

DATED this 5th day of October, 2016.

NELSON MULLINS RILEY  
& SCARBOROUGH LLP

By /s/ Daniel F. Blanks  
Daniel F. Blanks (FL Bar No. 88957)  
Lee D. Wedekind, III (FL Bar No. 670588)  
50 N. Laura Street, Suite 4100  
Jacksonville, Florida 32202  
(904) 665-3656 (direct)  
(904) 665-3699 (fax)  
[daniel.blanks@nelsonmullins.com](mailto:daniel.blanks@nelsonmullins.com)  
[lee.wedekind@nelsonmullins.com](mailto:lee.wedekind@nelsonmullins.com)

*Counsel for the Debtors and Debtors in Possession*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF on October 5, 2016. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Electronic Filing generated by CM/ECF:

David W. Baddley, Esq.  
U.S. Securities and Exchange Commission  
Office of Reorganization  
950 E. Paces Ferry Road, NE, Suite 900  
Atlanta GA 30326  
(404) 842-7625  
[atlreorg@sec.gov](mailto:atlreorg@sec.gov)  
*Attorneys for U.S. Securities and  
Exchange Commission*

Scott E. Bomkamp, Esq.  
Office of the United States Trustee  
Middle District of Florida  
400 W. Washington Street, Suite 1100  
Orlando FL 32801  
(407) 648-6301 ext. 150  
[scott.e.bomkamp@usdojgov](mailto:scott.e.bomkamp@usdojgov)  
*Attorneys for Guy G. Gebhardt,  
Acting U.S. Trustee for Region 21*

Ari Newman, Esq.  
Greenberg Traurig, P.A.  
333 S.E. 2nd Avenue, Suite 4400  
Miami, FL 33131  
(305) 579-0500  
[newmanar@gtlaw.com](mailto:newmanar@gtlaw.com)  
*Attorneys for Lang Feng, Haiping Zou,  
Jihe Zhang, and High Nature Holdings  
Limited*

Jay B. Verona, Esq.  
Shumaker, Loop & Kendrick, LLP  
101 E. Kennedy Blvd., Suite 2800  
Tampa, FL 33602  
(813) 229-7600  
[jverona@slk-law.com](mailto:jverona@slk-law.com)  
*Attorneys for George F. Eyde  
Orlando, LLC and Louis J. Eyde  
Orlando, LLC*

Scott M. Grossman, Esq.  
Greenberg Traurig  
401 East Las Olas Boulevard, Suite 2000  
Fort Lauderdale, FL 33301  
(954) 768-5212  
[grossmansm@gtlaw.com](mailto:grossmansm@gtlaw.com)  
*Attorneys for Lang Feng, Haiping Zou,  
Jihe Zhang, and High Nature Holdings  
Limited*

Jason B. Burnett, Esq.  
Alexandria V. Hill, Esq.  
GrayRobinson, P.A.  
50 N. Laura Street, Suite 1100  
Jacksonville, FL 32202  
(904) 598-9929  
[jason.burnett@gray-robinson.com](mailto:jason.burnett@gray-robinson.com)  
[alexandria.hill@gray-robinson.com](mailto:alexandria.hill@gray-robinson.com)  
*Attorneys for 417 Fifth Avenue Real  
Estate, LLC*

Andrew T. Jenkins, Esq.  
Bush Ross, P.A.  
P.O. Box 3913  
Tampa, FL 33601-3913  
(813) 224-9255  
[ajenkins@bushross.com](mailto:ajenkins@bushross.com)  
*Attorneys for Bank of America, N.A*

Kathy A. Jorrie, Esq.  
Pillsbury Winthrop Shaw Pittman LLP  
725 S. Figueroa Street, Suite 2800  
Los Angeles, CA 90017  
(213) 488-7251  
[Kathy.jorrie@pillsburylaw.com](mailto:Kathy.jorrie@pillsburylaw.com)  
*Attorneys for AEG Live, Inc.*

J. Ellsworth Summers, Jr., Esq.  
Burr Forman, LLP  
50 N. Laura Street, Suite 3000  
Jacksonville, FL 32202  
(904) 232-7200  
[esummers@burr.com](mailto:esummers@burr.com)  
*Attorneys for Michael J. Little*

D. Marcus Braswell, Jr., Esq.  
Sugarman & Susskind, P.A.  
100 Miracle Mile, Suite 300  
Coral Gables, FL 33134  
(305) 529-2801  
[mbraswell@sugarmansusskind.com](mailto:mbraswell@sugarmansusskind.com)  
*Attorneys for Theatrical Protective Union,  
Local No. One, IATSE*

Theodore B. Randles, Esq.  
U.S. Dept. of Justice  
1100 L Street NW, Suite 10060  
Washington, DC 20005  
(202) 307-3242  
[Theodore.B.Randles@usdoj.gov](mailto:Theodore.B.Randles@usdoj.gov)  
*Attorneys for the United States Department of  
Commerce, National Oceanic and Atmospheric  
Administration*

Brian D. Equi, Esq.  
Goldberg Segalla, LLP  
121 S. Orange Avenue, Suite 1500  
Orlando, FL 32801  
(407) 458-5608  
[bequi@goldbergsegalla.com](mailto:bequi@goldbergsegalla.com)  
[salamina@goldbergsegalla.com](mailto:salamina@goldbergsegalla.com)  
[sherndon@goldbergsegalla.com](mailto:sherndon@goldbergsegalla.com)  
*Attorneys for Structure Tone, Inc.*

Norman P. Fivel, Esq.  
Assistant Attorney General  
Office of the New York State Attorney General  
Civil Recoveries Bureau, Bankruptcy Litigation Unit  
The Capitol  
Albany, NY 12224-0341  
(518) 776-2264  
[norman.fivel@ag.ny.gov](mailto:norman.fivel@ag.ny.gov)  
*Attorneys for New York Dept. of Taxation  
and Finance*

Chris Broussard, Esq.  
Suzy Tate, Esq.  
Suzy Tate, P.A.  
14502 N. Dale Mabry Highway, Suite 200  
Tampa, FL 33618  
(813) 264-1685  
[cbrouss@suzytate.com](mailto:cbrouss@suzytate.com)  
[suzy@suzytate.com](mailto:suzy@suzytate.com)  
*Attorneys for The Armada Group GP, Inc.*

Richard R. Thames, Esq.  
Thames Markey & Heekin, P.A.  
50 N. Laura Street, Suite 1600  
Jacksonville, FL 32202  
(904) 358-4000  
[rrt@tmhlaw.net](mailto:rrt@tmhlaw.net)  
*Attorneys for Official Committee of  
Unsecured Creditors*

Avery Samet, Esq.  
Jeffrey Chubak, Esq.  
Storch Amini & Munves PC  
140 East 45th Street, 25th Floor  
New York, NY 10017  
(212) 490-4100  
[asamet@samlegal.com](mailto:asamet@samlegal.com)  
[jchubak@samlegal.com](mailto:jchubak@samlegal.com)  
*Attorneys for Official Committee of  
Unsecured Creditors*

Peter J. Gurfein, Esq.  
Roya Zur, Esq.  
Landau Gottfried & Berger LLP  
1801 Century Park East, Suite 700  
Los Angeles, CA 90067  
(310) 557-0050  
[pgurfein@lgbfirm.com](mailto:pgurfein@lgbfirm.com)  
[rzur@lgbfirm.com](mailto:rzur@lgbfirm.com)  
*Attorneys for Official Committee of Equity  
Security Holders of Premier Exhibitions,  
Inc.*

**Via U.S. Mail**

A-1 Storage and Crane  
2482 197th Avenue  
Manchester, IA 52057

ABC Imaging  
1155 21st Street NW  
Suite M400  
Washington, DC 20036

A.N. Deringer, Inc.  
PO Box 11349  
Succursale Centre-Ville  
Montreal, QC H3C 5H1

ATS, Inc.  
1900 W. Anaheim Street  
Long Beach, CA 90813

Broadway Video  
30 Rockefeller Plaza  
54th Floor  
New York, NY 10112

CBS Outdoor/Outfront Media  
185 US Highway 48  
Fairfield, NJ 07004

Dentons Canada LLP  
250 Howe Street  
20th Floor  
Vancouver, BC V6C 3R8

Enterprise Rent-A-Car Canada  
709 Miner Avenue  
Scarborough, ON M1B 6B6

Expedia, Inc.  
10190 Covington Cross Drive  
Las Vegas, NV 89144

George Young Company  
509 Heron Drive  
Swedesboro, NJ 08085

Gowling Lafleuer Henderson  
550-2300 Burrard Street  
Vancouver, BC V6C 2B5

Hoffen Global Ltd.  
305 Crosstree Lane  
Atlanta, GA 30328

Kirvin Doak Communications  
5230 W. Patrick Lane  
Las Vegas, NV 89118

MNP LLP  
15303 - 31st Avenue  
Suite 301  
Surrey, BC V3Z 6X2

Morris Visitor Publications  
PO Box 1584  
Augusta, GA 30903

NASDAQ Stock Market, LLC  
805 King Farm Blvd.  
Rockville, MD 20850

National Geographic Society  
1145 - 17th Avenue NW  
Washington, DC 20036

NYC Dept. of Finance  
PO Box 3646  
New York, NY 10008

PacBridge Limited Partners  
22/F Fung House  
19-20 Connaught Road  
Central Hong Kong

Pallet Rack Surplus, Inc.  
1981 Old Covington Cross Road NE  
Conyers, GA 30013

Ramparts, Inc.  
d/b/a Luxor Hotel and Casino  
3900 Las Vegas Blvd. South  
Las Vegas, NV 89119

Screen Actors Guild  
1900 Broadway  
5th Floor  
New York, NY 10023

Seaventures, Ltd.  
5603 Oxford Moor Blvd.  
Windemere, FL 34786

Soprintendenza Archeologica  
di Napoli e Pompei  
Piazza Museo 19  
Naples, Italy 80135

Syzygy3, Inc.  
1350 6th Avenue  
2nd Floor  
New York, NY 10019

TPL  
3340 Peachtree Road  
Suite 2140  
Atlanta, GA 30326

Verifone, Inc.  
300 S. Park Place Blvd.  
Clearwater, FL 33759

WNBC - NBC Universal Media  
30 Rockefeller Center  
New York, NY 10112

Jonathan B. Ross, Esq.  
Gowling WLG (Canada) LLP  
550 Burrard Street, Suite 2300, Bentall 5  
Vancouver, BC V6C 2B5

TSX Operating Co., LLC  
c/o James Sanna  
70 W. 40th Street  
New York, NY 10018  
***Creditor Committee***

B.E. Capital Management Fund LP  
Thomas Branzel  
205 East 42nd Street , 14th Floor  
New York, NY 10017  
***Creditor Committee***

Time Out New York  
475 Tenth Avenue  
12th Floor  
New York, NY 10018

TSX Operating Co.  
70 West 40th Street  
9th Floor  
New York, NY 10018

Sam Weiser  
565 Willow Road  
Winnetka, IL 60093

United States Attorney's Office  
Middle District of Florida  
300 N. Hogan Street, Suite 700  
Jacksonville, FL 32202

Christine R. Etheridge, Esq.  
Bankruptcy Administration  
Wells Fargo Vendor Financial Services, LLC  
PO Box 13708  
Macon, GA 31208

Dallian Hoffen Biotechnology Co., Ltd.  
c/o Ezra B. Jones  
305 Crosstree Lane  
Atlanta, GA 30328  
***Creditor Committee***

Jacob Brown, Esq.  
Katherine Fackler, Esq.  
Akerman LLP  
50 N. Laura Street, Suite 3100  
Jacksonville, FL 32202  
***Official Committee of Equity Security Holders***

/s/ Daniel F. Blanks

Attorney